

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JANE CRUDUP, )  
 ) Case No.  
 Plaintiff, ) 8:21CV0045  
 )  
 v. )  
 )  
 THE CITY OF OMAHA, )  
 )  
 Defendant. ) TAKEN IN BEHALF  
 ) OF PLAINTIFF  
 ----- )

APPEARANCES:

Mr. Potso Mahlangeni-Byndon For Plaintiff  
Attorney at Law  
2016 Fowler Avenue  
Omaha, NE 68110  
potso@byndonlaw.com

Ms. Michelle Peters For Defendant  
Deputy City Attorney  
CITY OF OMAHA LAW DEPARTMENT  
Omaha/Douglas Civic Center  
1819 Farnam Street, Suite 804  
Omaha, NE 68183  
michelle.peters@cityofomaha.org

DEPOSITION OF DAVID J. GRAUMAN, taken  
at 10:01 a.m. on March 31, 2022, Deanna L. Maley,  
RMR, CRR, and General Notary Public in and for  
the State of Nebraska, at 1819 Farnam Street,  
Suite 804, Omaha, Nebraska.

DIRECT - DAVID J. GRAUMAN (Byndon)

101

1 different items that were brought from Village  
2 Inn. And the firefighters -- after the house had  
3 taken what the firehouse needed, firefighters  
4 were encouraged to grab any remaining items and  
5 take them home if they wanted.

6 Q. So it sounds like you investigated  
7 pretty much the entire array of her complaints,  
8 with the exception of the mask incident, the  
9 helmet incident, and --

10 A. The study.

11 Q. -- the study incident.

12 A. Correct.

13 Q. Does that sound about right?

14 A. Yes. All of the -- a lot of these  
15 things you've just refreshed my recollection on  
16 the different allegations she made. I  
17 investigated the matters -- and I'm summarizing  
18 to some extent. But I investigated the matters  
19 related to Station 41 and the firefighters at  
20 Station 41. Doug Krysl investigated the matters  
21 that were outside of Station 41.

22 Q. Can you tell me the names of the  
23 individuals he interviewed?

24 A. From reading the emails you provided  
25 me today, he talked to Captain Shoemaker. I

DIRECT - DAVID J. GRAUMAN (Byndon)

207

1 indication in terms of granting IOD status? Yes  
2 or no? Can he do that?

3 MS. PETERS: I'm going to object on  
4 foundation. If you know, you may answer.

5 A. Again, my understanding is Chief  
6 Olsen would have no involvement in that process.

7 Q. Okay. You have no idea why she was  
8 not granted IOD status; correct?

9 A. No, I was in no way involved in her  
10 review -- her workers' compensation case, the  
11 review of that IOD claim. I generally -- again,  
12 don't quote me, I'm not an expert in this. I  
13 believe for a mental health issue, I think there  
14 has to be some relation to a physical  
15 manifestation of that, I believe. But you'd have  
16 to talk to one of our attorneys or Zach Wagner on  
17 that issue.

18 Q. Okay. Okay. All right.

19 A. And I guess I'll qualify it as well.  
20 They could have said it wasn't work-related as  
21 well. So there's a couple factors there like  
22 that.

23 MR. BYNDON: Okay. That's all I  
24 have, Counsel. You can go.

25 CROSS-EXAMINATION